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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92052260
Party	Defendant Edgar Alexander Barrera
Correspondence Address	ALEXANDER BARRERA 10 CASTANIA CT ST AUGUSTINE, FL 32086 UNITED STATES axlellism@netbusiness.com
Submission	Other Motions/Papers
Filer's Name	Edgar Alexander Barrera
Filer's e-mail	axlellism@netbusiness.com
Signature	/edgaralexanderbarrera/
Date	07/15/2012
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

STEPHEN A. WESTLAKE,

Petitioner,

EDGAR ALEXANDER BARRERA

Respondent.

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)  
) Cancellation No. 92/052,260  
) (Serial No. 77/378,015)  
)  
)  
)

**A NEW EMERGENCY MOTION FOR EXTENSION OF TIME  
AND RENEWED REQUEST FOR STAY OF PROCEEDINGS**

My brother, Edgar Alexander Barrera, the Respondent in this matter, is seriously ill. Recently, his medical condition has been so bad that he nearly died at least three times that I know of. I am extremely worried about him. He is suffering from acute pancreatitis. I am even having difficulty communicating with him on the phone.

I want to comply with helping him any possible way that I can during my brother's sickness.

This whole thing is so unfair that someone is trying to take his trademark, which is rightfully his.

It is impossible for me to file the Initial Disclosures within the time frame given to me.

I see that Initial disclosures include: the name, address, and telephone number of each individual likely to have discoverable information that the disclosing party may use in support of its claims or defenses; a description by category and location of all documents, electronically stored information, and tangible things that are in possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses.

From what I know, certain documents are located in several states primarily Florida, North Carolina and California in various locations. It requires me being able to take the necessary time to physically locate these documents and pertinent information as well as find out who his witnesses will be in this matter.

I'm physically in California and my brother is in Florida. The distance is 2,500 miles away. I will have to travel there in order to locate the pertinent



documents and information. In order for me to give this case the attention it requires, I am asking for thirty (30) additional days to give me time to work on this case.

I'm not familiar with this case. It will take me time to understand this and either retain counsel or file an answer directly by myself as my brother's power of attorney.

I haven't had the time to study the case and I need adequate time to locate documents and it therefore puts me at massive disadvantage and creates a terrible hardship.

I need the proper time to study this order, in order to go forward properly and it is technically difficult and hard to comprehend. I am not an attorney. I just need some time so that justice can be served and I can move forward with this case in order to help my brother. I'm asking for at least thirty (30) days to do this. I am also trying to find an attorney in the meantime, but I don't have access to my brother's records.

Respondent's Power of Attorney, under the circumstances, needs a further extension of time and respectfully pleads upon this Court to grant me this Motion and Request of not less than thirty (30) days.

I also plea that the proceedings be suspended pending the disposition of my motion.

The interests of justice will be served if this continuance and suspension of the proceedings is granted.

**WHEREFORE, Respondent's Power of Attorney respectfully seeks this Emergency Motion for an Extension of Time and Renewed Request for Stay of Proceedings based upon the foregoing reasons.**

Certified and Respectfully submitted by:

*Edgar Alexander Barrera by Melissa Barrera, Power of Attorney*  
 Edgar Alexander Barrera, Respondent  
 by Melissa Barrera, Power of Attorney  
 22159 Ladera Street  
 Grand Terrace, CA 92313

Telephone (909) 644-2799



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing instrument was placed in the United States Mail, postage prepaid, this 14th day of July, 2012, addressed to:

Mark Levy, 700 Security Mutual Bldg., 80 Exchange Street, Binghamton, NY  
13902

and

Kevin Guyette, 19 Chenango St. #1101, Binghamton, NY 13901-2904